

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**Teresa Hayes, on behalf of herself and others
similarly situated**

Plaintiff,

v.

**Transamerica Premier Life Insurance Company,
and Monumental Life Insurance Company**

Defendants.

CIVIL ACTION NO. 3:15-cv-313

JOINT MOTION FOR COURT APPROVAL OF SETTLEMENT

COME NOW the Plaintiff Teresa Hayes (“Plaintiff”) and Transamerica Premier Life Insurance Company and Monumental Life Insurance Company (“Defendant”), by their respective counsel, and jointly move this Court for entry of an Order approving the settlement reached by the Parties as a fair and reasonable settlement of a bona fide dispute arising under the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq.* (“FLSA”). The Parties incorporate herein the arguments set forth in the Memorandum of Law filed contemporaneously with this Motion.

WHEREFORE, for the reasons outlined above, and for the reasons contained in the accompanying memorandum of law, and for all other reasons apparent to the Court, the Parties respectfully request that this Court enter an Order approving the negotiated settlement as fair, reasonable, and adequate, and dismissing the action with prejudice.

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of October 2015, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing (NEF) to the following:

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